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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION.

Chapter 11

- and -

(Lead Case) (Jointly Administered)

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

**DECLARATION OF GABRIELLE L.
ALBERT IN SUPPORT OF REORGANIZED
DEBTORS' OMNIBUS REPLY IN FURTHER
SUPPORT OF THE ONE HUNDRED
FIFTEENTH OMNIBUS OBJECTION (NO
LIABILITY RECATEGORIZED CLAIMS)**

[Re: Dkt. Nos. 12173, 12469, 12377, 12470]

Date: July 12, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Gabrielle L. Albert, hereby declare pursuant to 28 U.S.C. § 1746:

2 1. I am an attorney with the firm Keller Benvenutti Kim LLP (“**KBK**”), a law firm with
3 offices at 650 California Street, Suite 1900, San Francisco, California 94108, counsel to PG&E
4 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and
5 reorganized debtors (collectively, the “**Debtors**,” “**PG&E**,” or the “**Reorganized Debtors**”) in the
6 above-captioned chapter 11 cases.

7 2. I submit this declaration (the “**Declaration**”) in support of the *Omnibus Reply in*
8 *Further Support of the One Hundred Fifteenth Omnibus Objection to Claims (No Liability*
9 *Recategorized Claims)*. Unless otherwise stated in this Declaration, I have personal knowledge of the
10 facts set forth herein and could and would testify competently thereto.

11 3. On May 13, 2022, KBK received two voicemails from claimant Martin Adame. Both
12 voicemails said that Mr. Adame would like to file an objection with respect to his claims, but provided
13 no additional information.

14 4. I called Mr. Adame on May 13, 2022 and May 31, 2022, and left voicemails both times.
15 I have not received a response to either voicemail.

16 5. Attached hereto as **Exhibit A** is a true and correct copy of an email I received from
17 claimant Stephen Richards.

18 6. Attached hereto as **Exhibit B** is a true and correct copy of a letter KBK received from
19 claimant Andrew Walters.

20 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
21 inquiry, the foregoing is true and correct. Executed this first day of July, 2022, in San Francisco,
22 California.

23 _____
24 /s/ *Gabrielle L. Albert*
25 Gabrielle L. Albert
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